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On Appeal From The Examiner To The Board
of Patent Appeals and Interferences

In re Application of:	Barry W. Field et al.
Serial No.:	09/390,420
Filing Date:	September 3, 1999
Group Art Unit:	2661
Examiner:	Steven Blount
Title:	Method and System for Transmitting Traffic Having Disparate Rate Components

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Willie Jiles
Willie Jiles

Date: November 4, 2005

Dear Sir:

Appeal Brief

Appellants have appealed to the Board of Patent Appeals and Interferences from the decision of the Examiner finally rejecting Claims 1-28, as evidenced in the Final Office Action mailed July 27, 2005. Appellants filed a Notice of Appeal on September 6, 2005. Appellants respectfully submit this Appeal Brief with the statutory fee of $500.00.

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Real Party In Interest

This application is currently owned by Cisco Systems, Inc., as indicated by an assignment recorded on November 1, 1999, in the Assignment Records of the United States Patent and Trademark Office at Reel 010354, Frames 0551-0554.

Related Appeals and Interferences

There are no known appeals or interferences which will directly affect or be directly affected by or have a bearing on the Board's decision regarding this appeal.

Status of Claims

Claims 1-28 are pending in this application and all stand rejected under a final Office Action mailed July 27, 2005. Appellants present Claims 1-28 for appeal. Appendix A shows all pending claims.

Status of Amendments

The Examiner has entered all amendments that were submitted before the final Office Action mailed July 27, 2005. No further amendments have been submitted.

Summary of Claimed Subject Matter

Embodiments of the present invention include a method and system for transmitting traffic having disparate rate components. For example, a method according to an embodiment of the invention includes receiving a plurality of traffic streams, each traffic stream including a first component and a reduced rate second component associated with the first component. The first components of the traffic streams are segmented into successive cells. Furthermore, the second components of the traffic streams are distributed between a defined set of the cells for in-band transmission of the second components in a payload of each of the cells, with the second components being positioned at the beginning of the payload of each cell.

An example embodiment of this method is illustrated in FIGURE 4 of the application. In this example embodiment, digital signal level 0 (DS-0) information with associated Channel Associated Signaling (CAS) is received for transmission in ATM adaptation layer (AAL) cells. In the embodiment, CAS values for a portion of the received DS-0 information are carried in-band in each AAL cell, with each successive cell carrying CAS values for a successive set of DS-0s. All the cells and/or frames need not carry CAS values or the same number of CAS values. In this way, the CAS values for all of the DS-0s are carried in-band within a defined number of cells that together form the superframe. The in-band transmission of the CAS values does not create jittering the AAL cell stream, simplifies AAL cell processing and minimizes delay. (Page 11, lines 17-30).

Referring to FIGURE 4, in the illustrated embodiment, the ATM AAL cell 60 includes a payload header 62 and an AAL payload 64. (Page 11, Lines 31-32). The AAL payload 64 includes a telephony control portion 74 and a telephony voice portion 76. (Page 12, Lines 7-8). The telephony voice portion 76 includes the DS-0 information 82. (Page 12, Lines 14-16). The telephony control portion 74 includes the in-band CAS values 80 transmitted within AAL cell 60. Thus, CAS values 80 for all DS-0s 82 may be carried in-band in the payload section 64 of defined number of AAL cells 60 that together form a superframe.

Furthermore, FIGURE 7 is a flow chart illustrating a method of transmitting of DS-0s in the ATM format. The method begins at step 100 in which a plurality of DS-0 channels are received from customer premise equipment. At step 102, the CAS values for the DS-0 channels are received from the customer premise equipment as superframe information.

Next, at step 104, the CAS values for each DS-0 are updated in CAS memory based on the received CAS values. Thus, the CAS memory always includes updated CAS values for the DS-0 channels. Proceeding to step 106, the DS-0 streams are segmented into successive AAL cells. At step 108, the CAS values associated with a portion of the DS-0s are inserted into each AAL cell in a superframe (for example, according to the sequence specified by the table of FIGURE 5 of the application or other suitable sequence). The included CAS values are read out of the CAS memory into the AAL cells. Next, at step 110, the AAL cells are transmitted over a network. (Page 15, line 11 – Page 16, line 2).

At step 112 of the example method, the AAL cells are received at a termination node and identified as including in-band CAS values. In a particular embodiment, AAL cells having in-band CAS values are identified based on the VPI and/or the VCI of the cell. Next, at step 114, the CAS values are extracted from the AAL cells. At step 116, CAS values are updated at the termination node for each DS-0 based on the extracted CAS values. Thus, the CAS storage at the destination node includes updated CAS value for each DS-0. The CAS values are used at the destination node to determine the status of the telephone call. Proceeding to step 118, the termination node reassembles at DS-0s streams for delivery to the associated customer premise equipment. The DS-0 streams are transmitted to the customer premise equipment 12 at step 120. In this way, the CAS values are carried in-band to provide a jitter free version of structured AAL1. It will be understood that other types of traffic streams with disparate rate components may be reformatted for in-band transmission of a slower component to provide jitter free transmission of the stream in accordance with the present transmission. (Page 16, lines 3-23).

Ground of Rejection to be Reviewed on Appeal

Appellants request that the Board review the Examiner's rejection of Claims 1-2, 4-12, 14-18, 20-22, and 24-28 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,018,525 issued to Sucharczuk ("*Sucharczuk*") in view of Appellants' admitted prior art ("*AAPA*") and either one of U.S. Patent No. 6,272,128 issued to Pierson Jr. ("*Pierson*") or U.S. Patent No. 6,714,543 issued to Brueckheimer et al. ("*Brueckheimer*").[1] Furthermore, Appellants request that the Board review the Examiner's rejection of Claim 13 under 35 U.S.C. §103(a) as being unpatentable over *Sucharczuk* in view of *AAPA* and either one of *Pierson* or *Brueckheimer*, as applied to Claim 1, and further in view of U.S. Patent No. 6,243,382 issued to O'Neil et al. ("*O'Neil*").

[1] It is assumed that Claims 3, 13, and 23 are also rejected in light of this combination since they previously were rejected under this combination, since the Office Action Summary indicates that all claims are rejected, and since the Examiner does not otherwise address these claims in the Final Office Action.

Argument

The Examiner's rejection of Claims 1-28 is improper, and the Board should withdraw the rejection for the reasons given below.

The Examiner rejects Claims 1-2, 4-12, 14-18, 20-22, and 24-28 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,018,525 issued to Sucharczuk ("*Sucharczuk*") in view of Appellants' admitted prior art (*AAPA*) and either one of U.S. Patent No. 6,272,128 issued to Pierson Jr. ("*Pierson*") or U.S. Patent No. 6,714,543 issued to Brueckheimer et al. ("*Brueckheimer*").[2] Furthermore, the Examiner also rejects Claim 13 under 35 U.S.C. §103(a) as being unpatentable over *Sucharczuk* in view of *AAPA* and either one of *Pierson* or *Brueckheimer*, as applied to Claim 1, and further in view of U.S. Patent No. 6,243,382 issued to O'Neil et al. ("*O'Neil*").

In order to establish a prima facie case of obviousness: (1) there must be some suggestion or motivation, either in the references themselves or in the knowledge available to one skilled in the art, to modify a reference or combine multiple references; (2) there must be a reasonable expectation of success; and (3) the prior art reference, or the combination of references, must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Appellants respectfully argue that *Sucharczuk*, the *AAPA, Pierson* and *Brueckheimer*, whether considered alone or in combination, all fail to teach or suggest all the limitations of Claims 1-28. Therefore, a prima facie case of obviousness cannot be maintained.

Claims 1, 14, 17, and 23 are Allowable Over the Cited References

Claim 1 recites the following limitations:

> A method for transmitting traffic having disparate rate components, comprising:
>
> receiving a plurality of traffic streams, each traffic stream including a first component and a reduced rate second component associated with the first component;

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[2] Again, it is assumed that Claims 3, 13, and 23 are also rejected in light of this combination since they previously were rejected under this combination, since the Office Action Summary indicates that all claims are rejected, and since the Examiner does not otherwise address these claims in the Final Office Action. It also should be noted that Claims 3 and 13 are dependent claims that recite similar limitations, but Claim 23 is an independent claim that recites different limitations. To the extent that the Examiner meant to treat Claims 3 and 13 separately from the other rejected claims, Appellants assume the Examiner would treat Claims 3, 13, and *25* in a similar fashion.

> segmenting the first components of the traffic streams into successive cells; and
>
> distributing the second components of the traffic streams between a defined set of the cells for in-band transmission of the second components in a payload of each of the cells, the second components being positioned at the beginning of the payload of each cell.

Claims 14, 17, and 23, as amended, recite similar, although not identical, limitations.

Appellants respectfully submit that the cited combination does not disclose, teach, or suggest all of these limitations. First, there is no motivation to combine these references. The question raised under 35 U.S.C. § 103 is whether the prior art taken as a whole would suggest the claimed invention taken as a whole to one of ordinary skill in the art at the time of the invention. *See* 35 U.S.C. § 103(a) (2000). Accordingly, even if all elements of a claim are disclosed in various prior art references, which is certainly not the case here as discussed below, the claimed invention taken as a whole cannot be said to be obvious without some reason given in the prior art why one of ordinary skill at the time of the invention would have been prompted to modify the teachings of a reference or combine the teachings of multiple references to arrive at the claimed invention.

The M.P.E.P. sets forth the strict legal standard for establishing a *prima facie* case of obviousness based on modification or combination of prior art references:

> To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references where combined) must teach or suggest all the claim limitations.

M.P.E.P. chs. 2142-43 (Rev. 2, May 2004). "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. ch. 2143.03 (Rev. 2, May 2004) (citations omitted).

In addition, the M.P.E.P. and the Federal Circuit repeatedly warn against using an applicant's disclosure as a blueprint to reconstruct the claimed invention. For example, the M.P.E.P. states, "The tendency to resort to 'hindsight' based upon applicant's disclosure is often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art." M.P.E.P. ch. 2142 (Rev. 2, May 2004). The governing Federal Circuit cases are equally clear.

> A critical step in analyzing the patentability of claims pursuant to [35 U.S.C. § 103] is casting the mind back to the time of invention, to consider the thinking of one of ordinary skill in the art, guided only by the prior art references and the then-accepted wisdom in the field. . . . Close adherence to this methodology is especially important in cases where the very ease with which the invention can be understood may prompt one "to fall victim to the insidious effect of a hindsight syndrome wherein that which only the invention taught is used against its teacher."

In re Kotzab, 217 F.3d 1365, 1369, 55 U.S.P.Q.2d 1313, 1316 (Fed. Cir. 2000) (citations omitted).

In the present case, the Examiner is attempting to modify *Sucharczuk* with *Pierson* or *Brueckheimer* to change the positioning of the CAS values disclosed in *Sucharczuk* (since the Examiner recognizes that *Sucharczuk* does not teach positioning the CAS values at the beginning of the payload of each cell, as required by the claims). However, *Sucharczuk* teaches away (at several places in the reference) from removing CAS values from their position in association with the corresponding user information (data, voice, etc.) being transmitted. As examples, Appellants refer the Board to Column 2, lines 6-13, Column 3, lines 27-42, and Column 4, lines 12-19 of *Sucharczuk.* Because *Sucharczuk* clearly teaches away from any modification in which the CAS values are grouped at the beginning of the payload of a cell, *Sucharczuk* cannot be modified as suggested by the Examiner (even assuming for the sake of argument that *Pierson* or *Brueckheimer* disclose placing CAS values at the beginning of the payload, which they do not).

Furthermore, in addition to teach away argument above, Applicants respectfully submit that the Examiner has failed to meet his burden of proving that there is a motivation to

combine these references. The Examiner simply argues it would have been obvious to combine the references "to provide a simplified design wherein the signaling information may be more easily located by the ATM system during the processing of the cells." (Final Office Action, pages 3-4). Furthermore, the Examiner states that he "believes that one of ordinary skill in the art would find it obvious to carry the signaling data at the front of the payload" in view of the fact that "it is well-known to carry signaling data at the front of a packet." (Final Office Action, page 4). The Examiner has failed to point to a teaching in the prior art as to why it would be obvious to *modify* the teachings of *Sucharczuk* with those of *Pierson* or *Brueckheimer*. The Examiner merely points out that *Pierson* or *Brueckheimer* disclose carrying signaling data at the front of the packet,[3] and does not show how it would be obvious to one of skill in the art to modify *Sucharczuk* as the Examiner suggests.

Furthermore, assuming for the sake of argument that the references could be combined, *Sucharczuk*, the *AAPA*, *Pierson*, and *Brueckheimer*, whether considered alone or in combination, fail to disclose "distributing the second components of the traffic streams between a defined set of the cells for in-band transmission of the second components in a payload of each of the cells, the second components being positioned at the beginning of the payload of each cell," as recited in Claim 1 (and similarly, although not identically, in Claims 14, 17, and 23). The Examiner asserts that this limitation is taught by both *Pierson* and *Brueckheimer*.

With respect to *Pierson*, the Examiner says that this limitation is disclosed by the ATM "signaling" that is carried at the front of an ATM cell. However, this ATM "signaling" information is not reduced-rate second components that are *associated with* first components that are distributed through-out the ATM cells (even assuming that the payloads of the ATM cells of *Pierson* may include segmented first components of a traffic stream). As an example only, this ATM "signaling" information is not the same as CAS values. There is no relationship disclosed in any of the reference between the ATM signaling information and the recited first components. Furthermore, even if it were assumed for the sake of argument that the ATM "signaling" is the recited second component, this signaling is clearly *not* positioned

[3] Again, these references do *not* disclose carrying signaling data at the front of a *payload* portion of a packet.

in the *payload* of the cell, as required by the claim. Instead, this information is in the header of the ATM cell and thus is not transmitted in-band with any first components.

With respect to *Brueckheimer*, the Examiner states that this reference teaches carrying control information in an ATM cell at the start of each payload. The only passage that the Examiner cites is Column 4, lines 50+, and Applicants do not see how this passage discloses anything about the positioning of information in the payload of an ATM cell, much less distributing second components of traffic streams between a defined set of the cells for in-band transmission of the second components in a payload of each of the cells, the second components being positioned at the beginning of the payload of each cell.

For at least these reasons, a prima facie case of obviousness cannot be maintained for Claims 1, 14, 17, and 23, as amended. Therefore, Appellants respectfully request allowance of Claims 1, 14, 17, and 23, as well as all claims that depend from these claims.

With respect to the Examiner's separate rejection of Claim 13, Claim 13 is dependent from Claim 1, which is allowable for the reasons provided above. Therefore, at least because Claim 13 depends from Claim 1, Appellants respectfully request reconsideration and allowance of Claim 13.

Claims 3, 19, and 25 are Allowable Over the Cited References

In addition to the fact that Claims 3, 19, and 25 depend from Claims 1, 17, and 23, which are allowable for the reasons discussed above, these claims are also allowable because they contain additional limitations not disclosed in the cited references. For example, Claim 3 recites "segmenting the first component of each traffic stream into a fixed position in the successive cells." Claims 19 and 25 recite similar, although not identical, limitations. In the Office Action mailed 1/30/04 (which the Examiner refers back to for arguments relating to all dependent claims other than Claim 13), the Examiner states that *Sucharczuk* discloses this limitation at Col. 3, Lines 53+. However, as discussed above with respect to Claims 1, 14, 17, and 23, *Sucharczuk* discloses that CAS values are placed in the cell payload at 12 octet intervals and that the locations of the CAS values repeat only every 12 cells. (*Sucharczuk*, Col. 3, Line 50 – Col. 4, Line 2). Thus, because the CAS values are placed throughout the cell payload and the locations of the CAS values change in successive cells, the position of

the data (i.e., the first component) must also vary within each successive cell to make room for variable positions of the CAS values. Therefore, *Sucharczuk* actually teaches way from segmenting the first component of each traffic stream into a *fixed position in the successive cells*, as recited in Claim 3, and similarly, although not identically, in Claims 19 and 25.

For at least this additional reason, a prima facie case of obviousness cannot be maintained for Claims 3, 19, and 25. Therefore, Appellants respectfully request reconsideration and allowance of Claims 3, 19, and 25.

Claim 16 is Allowable Over the Cited References

In addition to the fact that Claim 16 depends from Claim 14, which is allowable for the reasons discussed above, Claim 16 is allowable because it also contains additional limitations not disclosed in the cited references. For example, Claim 16 recites that the superframe contains 16 AAL cells. None of the cited references disclose this limitation. However, to fill the void in the prior art, the Examiner states that "the use of a 12 frame Superframe (SF) structure or a 24 frame Extended Superframe (ESF) structure is mentioned [in *Sucharczuk*], which would render obvious the use of a superframe which contains 16 AAL cells." (Office Action mailed 1/30/04, Page 5). Applicants believe that such a broad and conclusory type rejection is improper. If "common knowledge" or "well known" art is being relied on, Appellants have requested that a reference be provided in support of this position pursuant to M.P.E.P. § 2144.03. If personal knowledge is being relied on, Appellants have requested that an affidavit supporting such facts be provided pursuant to M.P.E.P. § 2144.03.

As disclosed in the present application, the use of a 16-cell superframe is advantageous because it allows a single superframe to be compliant with both North American and European data circuit terminating equipment. (Application, Page 12, Line 17 – Page 13, Line 3). In particular, European data circuit terminating equipment updates the CAS value once every 16 DS-0s. However, *Sucharczuk* is silent as to the use of its invention in compliance with European signaling protocols in this manner.

For at least this additional reason, a prima facie case of obviousness cannot be maintained for Claim 16. Therefore, Appellants respectfully request allowance of Claim 16.

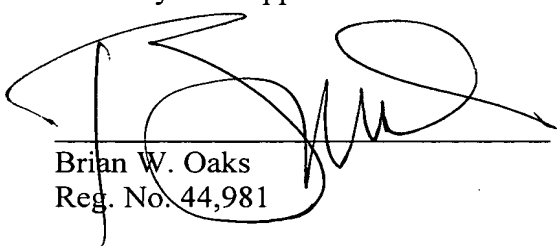
Conclusion

Appellants have demonstrated that the present invention, as claimed, is clearly distinguishable over the prior art cited by the Examiner. Therefore, Appellants respectfully request the Board of Patent Appeals and Interferences to reverse the final rejection of the Examiner and instruct the Examiner to issue a notice of allowance of all claims.

Appellants have enclosed a check in the amount of $500.00 for this Appeal Brief. Appellants believe no additional fees are due. The Commissioner is hereby authorized to charge any fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Appellants



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Appendix A: Claims on Appeal

1. (Previously Presented) A method for transmitting traffic having disparate rate components, comprising:

receiving a plurality of traffic streams, each traffic stream including a first component and a reduced rate second component associated with the first component;

segmenting the first components of the traffic streams into successive cells; and

distributing the second components of the traffic streams between a defined set of the cells for in-band transmission of the second components in a payload of each of the cells, the second components being positioned at the beginning of the payload of each cell.

2. (Original) The method of Claim 1, further comprising substantially evenly distributing the second components of the traffic streams between the defined set of cells.

3. (Original) The method of Claim 1, further comprising segmenting the first component of each traffic stream into a fixed position in the successive cells.

4. (Original) The method of Claim 1, wherein the defined set of cells is a superframe, further comprising transmitting successive superframes without insertion of intervening superframe information.

5. (Previously Presented) The method of Claim 1, wherein distributing the second component of the traffic streams between the defined set of cells comprises including in each cell payload the second component for a portion of the traffic streams such that the second components for all of the traffic streams are included within the defined set of cells.

6. (Original) The method of Claim 1, wherein the reduced rate second component comprises information received as superframe information.

7. (Original) The method of Claim 1, wherein the reduced rate second component comprises control information for the first component.

8. (Original) The method of Claim 1, wherein the first component is a DS-0 and the reduced rate second component is the Channel Associated Signaling (CAS) value for the DS-0.

9. (Original) The method of Claim 1, wherein the cell is asynchronous transfer mode (ATM) cell.

10. (Original) The method of Claim 1, wherein the first component is a DS-0, the reduced rate second component is the CAS value for the DS-0, and the cell is an ATM adaption layer (AAL) cell.

11. (Original) The method of Claim 10, further comprising repeating included CAS values in each AAL cell.

12. (Original) The method of Claim 10, further comprising providing a 4 bit sequence count in an AAL header for the AAL cell.

13. (Previously Presented) The method of Claim 1, further comprising:

storing a current value for the reduced rate second components for each traffic stream in a memory; and

retrieving the second components of traffic streams for inclusion in the cells from the memory.

14. (Previously Presented) A method for reformatting telephony traffic into asynchronous transport mode (ATM) adaption layer (AAL) cells for transmission on a network, comprising:

receiving a plurality of telephony streams, each telephony stream including a DS-0 channel and a Channel Associated Signaling (CAS) value for the DS-0 channel;

segmenting the DS-0 channels into successive AAL cells; and

including in a payload of each AAL cell the CAS value for a portion of the DS-0 channels such that the CAS values for all of the DS-0 channels are included within a superframe of AAL cells, the CAS values being positioned at the beginning of the payload of each AAL cell.

15. (Original) The method of Claim 14, wherein the superframe contains 24 AAL cells.

16. (Original) The method of Claim 14, wherein the superframe contains 16 AAL cells.

17. (Previously Presented) A telecommunications signal embodied in a transmission media comprising:

a superframe including a plurality of cells, each cell having a payload;

the cell payloads each comprising a successive segment of a first component for a plurality of traffic streams and a reduced rate second component for a portion of the traffic streams, the second components being positioned at the beginning of the payload of each cell; and

the cells in the superframes together comprising the reduced rate second components for all of the traffic streams.

18. (Original) A telecommunications signal of Claim 17, the first component comprising a DS-0 and the reduced rate second component comprising the CAS value for the DS-0.

19. (Previously Presented) The telecommunication signal of Claim 17, further comprising the successive segments of the first component for the traffic streams having a fixed position in each cell.

20. (Original) The telecommunications signal of Claim 17, the reduced rate second component comprising superframe information.

21. (Original) The telecommunications signal of Claim 17, the reduced rate second component comprising control information for the first component.

22. (Previously Presented) The telecommunications signal of Claim 17, substantially each cell in the superframe comprising reduced rate second components for a same number of traffic streams.

23. (Previously Presented) A telecommunications device, comprising:

one or more ports receiving a plurality of traffic streams, each traffic stream including a first component and a reduced rate second component associated with the first component; and

a reformatting device operable to segment the first components of the traffic streams into successive cells and to distribute the second components of the traffic streams between a defined set of cells for in-band transmission of the second components in a payload of each of the cells, the second components being positioned at the beginning of the payload of each cell.

24. (Original) The telecommunications device of Claim 23, further comprising the reformatting device operable to substantially evenly distribute the second components of the traffic streams between the defined set of cells.

25. (Original) The telecommunications device of Claim 23, further comprising the reformatting device operable to segment the first components of each traffic stream into a fixed position in the successive cells.

26. (Previously Presented) The telecommunications device of Claim 23, the reformatting device operable to include in each cell payload the second component for a portion of the traffic streams such that the second components for all of the traffic streams are included within the defined set of cells.

27. (Original) The telecommunications device of Claim 23, wherein the first component is a DS-0, the reduced rate second component is the CAS value for the DS-0 and the cell is an ATM adaption layer (AAL) cell.

28. (Original) The telecommunications device of Claim 27, the reformatting device operable to provide a 4 bit sequence count in an AAL header for the AAL cell.

Appendix B: Evidence

NONE

Appendix C: Related Proceedings

NONE